

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD OF PUERTO RICO

As representative of

THE COMMONWEALTH OF PUERTO RICO

Debtor

PROMESA
Title III

NO. 17-BK-03283 (LTS)

**REQUEST FOR APPOINTMENT OF UNSECURED CREDITORS
COMMITTEE PURSUANT TO 11 U.S.C. §1102(a)(1)**

TO THE HONORABLE COURT:

COMES NOW creditor and interested party **CESAR CASTILLO, INC.**, (hereinafter “CCI”) through the undersigned Counsel, and respectfully prays and avers as follows:

1. On May 3, 2017 the Financial Oversight and Management Board of Puerto Rico (hereinafter “Debtor”) filed a petition for relief on behalf of the Commonwealth of Puerto Rico (the “Petition”) under title III of PROMESA, Pub. Law 114-187 (130 STAT. 549).
2. As of the date of this Motion, and notwithstanding the fact that several “First Day Motions” have been filed by Debtor, no unsecured creditors’ committee has been established or appointed.
3. As noted in Debtor’s Petition, CCI is listed as one of Debtor’s twenty largest unsecured creditors¹.

¹ CCI is listed on Schedule B to the Petition with an unsecured claim of \$6,008,917.52.

4. Pursuant to 11 U.S.C. 1102(a)(1), made applicable to this proceedings by Title III, Section 301 of PROMESA, as soon as practicable after the Order of relief has been entered, the U.S. Trustee shall appoint a committee of creditors holding the largest unsecured claims.
5. Title III, Section 304(c) of PROMESA provides that the commencement of a case under PROMESA does constitute an order for relief.
6. In view of the foregoing, CCI hereby informs the Court of its availability and willingness to serve in the unsecured creditors' committee, and requests the Court to order the appointment of an Unsecured Creditors Committee.

WHEREFORE, the here appearing creditor respectfully requests this Honorable Court to take notice of the foregoing and to Order the appointment of an Unsecured Creditor's Committee.

CERTIFICATE OF SERVICE: I hereby certify that on this same date I electronically filed the foregoing with the Clerk of the Bankruptcy Court using the CM-ECF system which will send notification of such filing to all CM-ECF participants registered to receive notices in the case at bar. We further certify that a copy of this Motion was sent via email to Counsel for the Puerto Rico Fiscal and Financial Advisory Authority through Gerardo Portela at Gerardo.Portela@aafaf.pr.gov, to Mohammad Yassin, at Mohammad.Yassin@aafaf.pr.gov; to Counsel for AAFAF through John J. Rapisardi, Esq., Suzzanne Uhland, Esq., Peter Friedman, Esq., Diana M. Perez, Esq. at the following emails jrapisardi@omm.com, suhland@omm.com, pfriedman@omm.com, dperez@omm.com; Counsel for the Oversight Board, through Martin J. Bienenstock, Scott K. Rutsky, Paul V. Possinger, Ehud Barak, Maja Zerjal, mbienenstock@proskauer.com, srutsky@proskauer.com, ppossinger@proskauer.com, ebarak@proskauer.com, mzerjal@proskauer.com, and Hermann D. Bauer, Esq. at herman.bauer@oneillborges.com. We further certify that a printed courtesy copy was sent to the office of the U.S. Trustee at

Office of the U.S. Trustee, Ochoa Building, San Juan, PR; and to Honorable Judge Laura Taylor Swain, at the Clemente Ruiz Nazario United States Court House, 150 Carlos Chardon Ave., San Juan, PR.

RESPECTFULLY SUBMITTED in San Juan, Puerto Rico, on May 15, 2017.

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